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Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

SEP 22 1989

Federal Communications Commission
Office of the Secretary

RE: A.C. Nielsen Company Request to Move Its "AMOL" from
Line 20 in the Vertical Blanking Interval to Line 22 of
the Active of Television Video Signal (DA89-1060)

Dear Ms. Searcy:

These Comments are filed on behalf of Westinghouse Broadcasting Company, Inc. (Group W) in the above-referenced proceeding. Group W is the licensee of five television stations^{1/} and also, through its Group W Productions division, has significant interests in syndicated television programming. Therefore, Group W has an interest in this proceeding both from the perspective of a television broadcaster and a program producer.

As a long time broadcaster, Group W has traditionally championed protecting the integrity of the broadcast signal. The quality of over-the-air broadcasting must remain high, especially in this era of competition from other high quality audio and video sources. For example, Group W has participated in the Commission's recent series of proceedings regarding

^{1/} KYW-TV, Philadelphia, Pennsylvania; WBZ-TV, Boston, Massachusetts; KPIX, San Francisco, California; KDKA-TV, Pittsburgh, Pennsylvania; WJZ, Baltimore, Maryland.

improving the quality of AM radio and is an active participant in Commission and industry proceedings on HDTV. Because of its interest in high quality over-the-air broadcasting, Group W expresses its concern that the Commission move carefully in authorizing ancillary uses of the "active portion" of the television video signal, including Line 22.

To date, there does not appear to be any significant degradation of the visible television picture through the proposed uses of Line 22. The Commission has granted authority similar to that requested by Nielsen in this proceeding to other companies, including TeleScan, Inc. and Ad Audit, Inc. on January 18, 1985, and Republic Properties, Inc. on November 6, 1986 (subsequently transferred to Air Trax, Inc. on August 28, 1987). The Nielsen request would seem to be consistent with the authority authorized by the Commission in these previous grants.

As a program producer, Group W sees a critical need for high quality and timely ratings information. The Nielsen proposal is one which can be extremely valuable to the television market place. It will allow Nielsen to improve ratings quality through greater accuracy and timeliness. Such an improvement would provide producers of syndicated programming with ratings of equal quality to network ratings. To provide these valuable improvements, Nielsen would need to move its Automated Measurement of Line-Ups to Line 22.

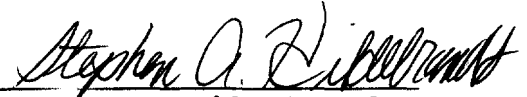
Since the Commission is already authorizing other uses of Line 22, Group W supports Nielsen's request to use this Line provided there continues to be no signal degradation. The

request is supported by a valid public interest purpose which would allow for improved service to the broadcasting industry. At the same time, Group W urges the Commission to continue to monitor all uses of Line 22 to ensure that there is no signal degradation which would in any way compromise the quality of over-the-air broadcasting. In particular, the Commission should not use this action as a broad precedent to authorize uses of other lines or portions of the broadcast spectrum. Each use must be carefully evaluated to ensure the ultimate integrity of the broadcast signal.

Respectfully Submitted,

Westinghouse Broadcasting
Company, Inc.

By:


Stephen A. Hildebrandt
Chief Counsel and
Assistant Secretary